

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EDWARD D. ELIASON, and)	
RACHELLE D. ELIASON,)	
)	
Plaintiffs,)	Case No. 19-cv-829
v.)	(Jury Trial Demanded)
)	
SUPERIOR REFINING)	
COMPANY LLC,)	
)	
Defendant.)	

PENNY L. BELL-YELLIN and)	
BRUCE M. YELLIN,)	
)	
Plaintiffs,)	Case No. 20-cv-0631
v.)	(Jury Trial Demanded)
)	
SUPERIOR REFINING COMPANY LLC,)	
)	
Defendant.)	

ROBERT FAGAN, SHAWN HAGENAH,)	
BRADLEY A. JENSEN, DANIEL THOMAS,)	
and JOSEPH G. STEPHANI,)	
)	
Plaintiffs,)	Case No. 20-cv-0685
v.)	
)	
SUPERIOR REFINING CO., LLC,)	
)	
Defendant.)	

CHERRIE D. MOORE,)	
)	
Plaintiff,)	Case No. 20-cv-632
v.)	(Jury Trial Demanded)
)	
SUPERIOR REFINING)	
COMPANY LLC,)	

)	
Defendant.)	
<hr/>		
EDWARD WYSOCKI, et al.)	
)	
Plaintiffs,)	Case No. 21-cv-00006
v.)	(Jury Trial Demanded)
)	
SUPERIOR REFINING)	
COMPANY LLC,)	
)	
Defendant.)	

STIPULATION AND [PROPOSED] RULE 502(d) ORDER

WHEREAS, the Plaintiffs have asked SRC to produce documents in the Consolidated cases, some of which defendant represents were produced in the *Bruzek* litigation pursuant to a Federal Rule of Evidence 502(d) Order (“502(d) Order”). The documents produced pursuant to the 502(d) Order were originally listed on Defendants’ April 13, 2020 Log of Documents Withheld for Privilege and Defendants’ May 27, 2020 Log of Documents Clawed Back for Privilege (“*Bruzek* Logs”) for the *Bruzek* litigation;

WHEREAS, in the *Bruzek* litigation, Defendants produced documents on the *Bruzek* Logs as SRC_BRUZEK-000196511 through SRC_BRUZEK-000198463, pursuant to the *Bruzek* 502(d) Order entered at *Bruzek* Docket 174;

WHEREAS, Parties have agreed that the documents produced pursuant to the Order entered in the *Bruzek* litigation at *Bruzek* Docket 174, will be produced pursuant to a similar Rule 502(d) Order in the Consolidated litigation.

NOW THEREFORE, the Parties in the above-captioned matter submit this [Proposed] Rule 502(d) Order with respect to the *Bruzek* Logs documents identified by Bates number above, and any other *Bruzek* Logs items that the Parties may later agree to produce pursuant to this Order.

Dated: May 21, 2021

By: /s/ Matthew S. Sims

Dated: May 21, 2021

By: /s/ Colleen M. Kenney

ORDER PURSUANT TO RULE 502(d)

1. The production of the documents listed above shall not constitute a waiver of any applicable protection or privilege regarding the subject matter of the documents for the purposes of this matter and any other federal or state proceeding.

2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

SO ORDERED:

Dated: 5-24-21, 2021



STEPHEN L. CROCKER
Magistrate Judge